

November 6, 2017

Patrick Streeter, Senior Planner
City of Santa Rosa Planning Division
100 Santa Rosa Ave., Room 3
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Subject: Assessment of Change in Baseline Environmental Conditions on the Analysis Contained in the Public Review Draft Initial Study / Mitigated Negative Declaration Prepared for the Proposed Emerald Isle Assisted Living Facility Project

Dear Patrick,

On September 25, 2017 a Draft Initial Study / Mitigated Negative Declaration (ISMND) identifying the potential environmental impacts of the proposed Emerald Isle Assisted Living Facility Project (Project) and mitigation measures that would address those impacts was released for public review. Subsequently, on October 8, the Tubbs Fire began to burn in the northern part of Santa Rosa, engulfing a 36,390-acre area that includes the Project site. In total, the Tubbs Fire destroyed more than 2,800 structures in the City of Santa Rosa and caused an estimated \$1.2 billion in damage, making it one of the most destructive fires in California history.

In view of this context, the City has requested an evaluation of how the change in baseline conditions affects the analysis contained in the Draft ISMND circulated for public review between September 25 and October 24, 2017. This memo documents current conditions on the Project site and in the surrounding area, and provides the requested assessment of the previous environmental analysis.

Project Description

The Project site is located at the eastern end of Gullane Drive, surrounded by the Fountaingrove Golf and Athletic Club in the northern part of the City of Santa Rosa. The 12.7-acre site is located in hilly terrain adjacent to Fountaingrove Lake, with dense tree coverage. The Project would involve construction and operation of a 68,144-square-foot assisted living facility on the site, providing up to 71 beds in 49 units for assisted living and memory care as well as a range of on-site dining and recreational amenities. The proposed facility would be constructed at the center of the site, with a winding driveway leading from Gullane Drive to the main entrance to the building and wrapping around the northern and southern ends of the building.

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Current Conditions on the Project Site

As of October 31, 2017 the fire damage area is closed to the public and FCS was unable to inspect the site; however, City officials provided photographs taken on-site October 18, 2017 (Exhibit 1). FCS relied on these photographs and recent aerials of the site and surroundings (Exhibit 2) to assess current conditions. As can be seen, the surrounding area was significantly impacted by the Tubbs Fire. Directly to the west and north of the Project site, single-family homes along Gullane Drive and Thomas Lake Harris Drive were completely destroyed, although the Fountaingrove Lodge immediately to the southwest of the site was unaffected by the wildfire. On the Project site, the wildfire burned understory vegetation onsite and some trees have trunk damage which may result in their removal. However overall, the Project site sustained minimal burn damage and a majority of the trees on site remains intact. There were no buildings on the Project site prior to the fires and therefore no structural burn debris would require removal. Considering the level of destruction that occurred elsewhere in the community as a result of the wildfires, the Project site appears to have survived in relatively good shape.

Assessment of Draft CEQA Analysis

The following is an assessment of the validity of the environmental analysis in the Draft ISMND, considering the change in baseline conditions following the wildfires. Each topical area discussed in the Draft ISMND is reviewed below.

Aesthetics: The Draft ISMND did not find any significant impacts related to aesthetics or visual resources. In general, it was determined that the dense tree canopy on-site would screen the proposed development from view and prevent substantial adverse light or glare impacts. While the wildfire burned understory vegetation onsite and some trees have trunk damage which may result in their removal, as can be seen in the photos of the fire damage, most of the trees onsite remain intact. As such, off-site views of the proposed building would still be largely screened by vegetation and the findings of the analysis with respect to scenic vistas, visual character, and light and glare would remain less than significant.

Agricultural and Forestry Resources: The Project site does not contain Farmland mapped as by Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, nor is it zoned for agricultural use or encumbered by a Williamson Act contract. The fires do not change this condition. While the 320-acre plot of land designated “Mixed Enrollment Agricultural Land” approximately 0.4 miles to the west of the Project site was most likely significantly affected by the Tubbs Fire, development of the Project would not affect the resumption of agricultural activities on that site, which is outside of the City limit and Urban Growth Boundary. Further, the wildfires did not affect the zoning of the site or the presence/absence of forest land, timberland, or land zoned for Timberland Production. As a result, the analysis of the Draft ISMND related to Agricultural and Forestry resources remains valid.

Air Quality: The Draft ISMND identified potential construction period air quality impacts and mitigation measures that would reduce those impacts to a less than significant level. During the wildfires, ambient air quality in the Santa Rosa area deteriorated substantially and the level of fine particulate matter



pollutants (PM 2.5) increased significantly. However, this change was temporary and directly linked to the wildfires. Subsequently, air quality in the Santa Rosa area has returned to normal levels. As such, with implementation of the mitigation measures recommended in the Draft ISMND, potential air quality impacts associated with Project construction and operation would be less than significant. The analysis of the Draft ISMND remains valid.

Biological Resources: The Draft ISMND identified potential impacts to special-status plant species, special-status bats, and migratory birds and raptors as well as to Oak woodland habitat and trees; however, with implementation of the recommended mitigation measures impacts it was determined that impacts would be reduced to a less than significant level. As noted above, while the wildfire burned understory vegetation onsite and some trees have trunk damage which may result in their removal, the dense tree cover onsite remains largely intact. The presence of species and habitat identified in the Draft ISMND has not substantially diminished since the wildfire and as a result implementation of the recommended mitigation measures would still ensure that impacts are reduced to a less than significant level.

Cultural Resources: Based on a records search at the Northwest Information Center and a pedestrian survey of the site, the Draft ISMND determined that there are no known cultural, tribal cultural or historic resources on the site. The wildfire did not alter this condition. In the event of accidental discovery of as-yet undiscovered resources during excavation or construction, implementation of the recommended mitigation measure would still ensure that impacts are reduced to a less than significant level. Therefore the analysis contained in the Draft ISMND remains valid.

Geology and Soils: The Project site's existing soils and geology would not be affected by the limited fire damage on-site. The fire burned the understory, grasses, and some trees on-site. However, erosion due to loss of vegetation from construction was anticipated in the analysis and compliance with the Municipal Code would reduce the potential for erosion to the maximum extent practicable. Further, implementation of the recommended geotechnical mitigation measures related to seismic ground shaking, unstable soils and expansive soils would still ensure that impacts are reduced to a less than significant level. Therefore the analysis contained in the Draft ISMND remains valid.

Greenhouse Gas Emissions: The Draft ISMND determined that the Project would not result in short-term construction period emissions or long-term operational emissions in excess of standards established by the Bay Area Air Quality Management District (BAAQMD) and that the Project would not conflict with the Santa Rosa Climate Action Plan. GHG emissions associated with the Project would be the same as identified in the Draft ISMND and as such, the analysis contained in the Draft ISMND remains valid.

Hazards and Hazardous Materials: The site is undeveloped and does not contain any hazardous materials associated with past uses. Implementation of the proposed Project would not substantially alter the risk of wildfire on the site, and continued implementation of existing wildfire mitigation strategies by responsible agencies in the area as well as implementation of any additional strategies to be developed and implemented in the coming months would be sufficient to ensure that the associated



impacts from Project implementation remain less than significant. Therefore the analysis contained in the Draft ISMND remains valid.

Hydrology and Water Quality: The wildfire does not alter the drainage pattern of the site or increase the risk of damage or death from flooding, seiche or tsunami. However, the removal of understory vegetation as a result of the wildfire could increase the potential for erosion and by extension the possibility of stormwater pollution or mudflows. Compliance with existing regulations and construction of the onsite stormwater treatment facilities proposed as part of the Project would reduce associated impacts to a less than significant level. Therefore the analysis contained in the Draft ISMND remains valid.

Land Use and Planning: The Draft ISMND found that the Project would not conflict with the Santa Rosa General Plan or the Santa Rosa Municipal Code, nor that it would physically divide an existing community or conflict with a Habitat Conservation Plan. Therefore the analysis contained in the Draft ISMND remains valid.

Mineral Resources: There are no significant mineral resources present on the site and no active mining operations. The wildfire does not alter this fact. Therefore the analysis contained in the Draft ISMND remains valid.

Noise: The Draft ISMND identified construction period noise impacts to sensitive residential receptors in the vicinity of the site. The wildfire destroyed homes in the area and at the moment there are no residents in the neighborhood. As homes are rebuilt and residents return to the vicinity of the Project site, compliance with existing City of Santa Rosa noise regulations and implementation of recommended mitigation measure NOI-1 from the Draft ISMND would ensure that construction period noise impacts to nearby sensitive receptors would be less than significant. The analysis of the Draft ISMND remains valid.

Population and Housing: As a result of the wildfire, there is an increased need for housing for all segments of the population in Santa Rosa. The Draft ISMND determined that impacts associated with population and housing resulting from implementation of the Project would be less than significant. Subsequent to the wildfires, associated impacts would be reduced. Therefore, the findings of the Draft ISMND represents a conservative analysis and the determinations remain valid.

Public Services and Recreation: The Draft ISMND found that the Project would have less than significant impacts to Public Services and Recreational Facilities. The fire has destroyed public facilities in the city, including fire stations, police stations, schools, parks, libraries and recreational facilities. However, given the age of Project residents and the range of amenities to be provided on-site, the Project is not anticipated to adversely affect delivery of public services such that new facilities would need to be constructed. This would not change with Project implementation and as such the analysis of the Draft ISMND stands. Therefore, analysis of the Draft ISMND remains valid.





Transportation and Traffic: A Traffic Impact Study completed for the Project determined that less than significant impacts would result with respect to level of services (LOS) standards established in the Santa Rosa General Plan and that the Project would not have a substantial adverse impact on the performance of the CMP network. Subsequent to the wildfire, the residential population of the surrounding area has substantially decreased and as such the analysis contained in the Draft ISMND represents a conservative analysis. The wildfire would not change the other findings of the Draft ISMND and implementation of recommended Mitigation Measure Trans-1 would ensure adequate site line distance and less than significant impacts with respect to roadway hazards. Therefore, the determinations remain valid.

Utilities and Service Systems: A water distribution tank serving the site and surrounding area was damaged and two wastewater lift stations were destroyed. The City has deployed temporary work-arounds for these services and has included the repair and reconstruction of these capital facilities in its disaster recovery package. Long-term impacts to utility and service systems in the area of the Project site are negligible and the analysis contained in the Draft ISMND remains valid. As discussed above, regulatory compliance and the installation of proposed stormwater treatment facilities onsite as part of the Project would limit increase stormwater volume and flow to the maximum extent practicable and ensure less than significant impacts. As such, the analysis contained in the Draft ISMND remains valid.

Sincerely,

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Enc: Exhibit 1: Emerald Isle Site Photos (October 2017)
Exhibit 2: Aerial Photograph of Fountaingrove Lake Area (October 2017)





Photograph 1:



Photograph 2:



Photograph 3:



Photograph 4:

Source: FirstCarbon Solutions, 2017.

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Exhibit 1
Post Fire Site Photographs

OAKMONT SENIOR LIVING • EMERALD ISLE ASSISTED LIVING FACILITY PROJECT
FIRE DAMAGE MEMO



Source: Digital Globe, 2017; Sonoma County, 2016

